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## Attorneys for the Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE:**

**NEWLAND INTERNATIONAL  
PROPERTIES, CORP.,**

**Debtor.**

## Chapter 11

**Case No. 13-11396 (MG)**

**NOTICE OF FILING OF SECOND SUPPLEMENT TO THE PLAN  
SUPPLEMENT FOR THE PREPACKAGED PLAN OF REORGANIZATION  
FOR THE DEBTOR UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE THAT**, in support of confirmation of the *Prepackaged Plan of Reorganization for the Debtor Under Chapter 11 of the Bankruptcy Code*, which was filed with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) on April 30, 2013 [Docket No. 11] (as may be amended or modified, the “**Plan**”), on May 17, 2013 the above-captioned debtor and debtor in possession (the “**Debtor**”) filed the *Plan Supplement for the Prepackaged Plan of Reorganization for the Debtor Under Chapter 11 of the Bankruptcy Code* [Docket No. 73] (as may be altered, amended, modified or supplemented, the “**Plan Supplement**”) with the Bankruptcy Court. Certain documents to be included with the Plan Supplement remained under discussion among parties in interest and/or were subject to review by the Bankruptcy Court for purposes of determining whether such documents contained confidential commercial information and were therefore not included in the initial filing.<sup>1</sup>

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to such terms in the Plan or the Disclosure Statement.

**PLEASE TAKE FURTHER NOTICE THAT** on May 20, 2013, the Debtor filed with the Bankruptcy Court the *First Supplement to the Plan Supplement for the Prepackaged Plan of Reorganization for the Debtor Under Chapter 11 of the Bankruptcy Code* [Docket No. 76].

**PLEASE TAKE FURTHER NOTICE THAT** on May 21, 2013, the Debtor filed with the Bankruptcy Court the *Second Supplement to the Plan Supplement for the Prepackaged Plan of Reorganization for the Debtor Under Chapter 11 of the Bankruptcy Code* [Docket No. 84], which contains the following documents, as may be amended, modified or supplemented from time to time by the Debtor in accordance with the Plan:

**Exhibit T**: Amended Trump Ocean Club Summary of Trump Agreements and Concessionary Amendments

**Exhibit U**: Eighth Amendment to License Agreement (REDACTED)

**Exhibit V**: First Amendment to Amended and Restated Hotel Management Agreement (REDACTED)

**Exhibit W**: First Amendment to Pre-Opening Services Agreement (REDACTED)

**Exhibit X**: First Amendment to P.H. TOC Management Agreement (REDACTED)

**Exhibit Y**: Amended and Restated Hotel Asset Management Agreement

**Exhibit Z**: Amendment to Mortgage Agreement (Translated)

The documents contained in the Plan Supplement are integral to and part of the Plan and, if the Plan is approved, shall be approved in the Confirmation Order. The Debtor reserves the right to alter, amend, supplement or modify the Plan Supplement.

**PLEASE TAKE FURTHER NOTICE THAT** on May 22, 2013, the Court entered the *Consent Order Authorizing the Debtor to File Under Seal Certain Confidential Plan Supplement Documents* [Docket No. 83], authorizing the Debtor to file Exhibits U, V, W and X to the Plan Supplement in redacted form to protect confidential commercial information contained therein.

**PLEASE TAKE FURTHER NOTICE THAT** that, pursuant to the *Order (A) Scheduling a Combined Hearing to Consider the Adequacy of the Disclosure Statement and Confirmation of the Plan; (B) Establishing Deadlines and Procedures to File Objections Related Thereto; and (C) Approving the Form and Manner of the Notice of Combined Hearing*, entered on May 1, 2013 [Docket No. 30], the Court will consider, among other things, the approval of the Solicitation Procedures, the adequacy of the Disclosure Statement and confirmation of the Plan (the “**Confirmation Hearing**”) on **May 28, 2013 at 5:30 p.m. (prevailing U.S. Eastern Time)** before the Honorable Judge Martin Glenn, in the United States Bankruptcy Court for the Southern District of New York, located at One Bowling Green, Courtroom No. 501, New York, New York 10004; *provided, however*, that the Confirmation Hearing may be continued from time to time by the Debtor or by the Bankruptcy Court without further notice to parties in interest other than the announcement of such adjournment in open court and/or the filing by the Debtor

of a notice of adjournment with such notice posted on the Debtor's restructuring website at <http://dm.epiq11.com/newland> and served on all parties entitled to notice.

**PLEASE TAKE FURTHER NOTICE THAT** certain documents, or portions thereof, contained in the Plan Supplement remain subject to continuing negotiations among the Debtor and interested parties with respect thereto. The Debtor reserves all rights to amend, modify, or supplement the Plan Supplement, and any of the documents contained therein, in accordance with the terms of the Plan. To the extent material amendments or modifications are made to any of these documents, the Debtor will file a blackline with the Bankruptcy Court prior to the Confirmation Hearing marked to reflect same.

**PLEASE TAKE FURTHER NOTICE THAT** if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement or related documents, you should contact Epiq Bankruptcy Solutions, LLC, the claims and noticing agent retained by the Debtor in this Chapter 11 Case (the "***Claims and Noticing Agent***"), by: (a) calling the Debtor's Claims and Noticing Agent at (646) 282-2400; (b) visiting the Debtor's restructuring website at <http://dm.epiq11.com/newland>; (c) emailing the Debtor's Claims and Noticing Agent at [newland@epiqsystems.com](mailto:newland@epiqsystems.com); and/or (d) writing to Newland International Properties, Corp., c/o Epiq Bankruptcy Solutions, LLC, 757 Third Avenue, 3<sup>rd</sup> Floor, New York, New York 10017. You may also obtain copies of any pleadings filed in this Chapter 11 Case for a fee via PACER at <http://ecf.nysb.uscourts.gov>.

Dated: May 22, 2013  
New York, New York

/s/ J. Eric Wise

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